

State Water Resources Control Board

March 8, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7017 2680 0000 6195 8381

Mr. Douglas Guenther
Installation Environmental Specialist
Environmental Division
Navy Base Ventura County
311 Main Road, Building 1,
Point Mugu, California 93042
douglas.c.guenther@navy.mil

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT NAVY BASE VENTURA COUNTY – POINT MUGU, 311 MAIN
ROAD, POINT MUGU**

Dear Mr. Guenther:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on February 23, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Release Response Plan – The release response plan uploaded in CERS lists facility employees who are no longer employed at the facility.	All	February 23, 2018	Ongoing	23 CCR 2632(d)(2), 2634(e)
2	Failure to Meet Designated Operator (DO) Inspection Requirements – The alarm history reports were not affixed to the monthly DO reports between the months of July 2017 and January 2018. Additionally, the DO monthly report for March 2017 was not present at the time of inspection.	All	February 23, 2018	Ongoing	23 CCR 2715(c)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Maintain Plot Plan/Site Map – An approved plot plan/site map indicating the location of the product piping, tanks, and auxiliary equipment with respect to buildings or other landmarks, such as the street, was not available in CERS or onsite at the time of the inspection.	All	February 23, 2018	Ongoing	H&SC 25286(a); 23 CCR 2711(a)(8)
4	Failure to Monitor Product Piping – The product line testing boot for tank B-19 was not pulled off and a cap was screwed onto the testing valve, preventing a leak from being detected. The sensor inside the transition sump was not in a vertical position preventing its ability to detect a leak at the earliest possibility. Lastly, the sensors located in all four under dispenser containers (UDC) were not located in the lowest points. All corrected at the time of inspection.	Tank B-19, transition sump, UDCs	February 23, 2018	February 23, 2018	23 CCR 2630(d)
5	Failure to Install Monitoring Equipment According to Manufacturer's Instructions – The annular sensor was observed with a splice enclosed in an epoxy-pack, but it was not enclosed within the explosion proof junction box.	Tank B-17	February 23, 2018	Ongoing	23 CCR 2638(a)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Ventura County Environmental Health within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov

Local CUPA

Mr. Rick Bandelin
Environmental Health Manager
Ventura County Environmental Health
800 South Victoria Avenue
Ventura, California 93009
rick.bandelin@ventura.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Rick Bandelin
Environmental Health Manager
Ventura County Environmental Health
rick.bandelin@ventura.org

Ms. Alicia Morales
Supervising Environmental Health Specialist
Ventura County Environmental Health
alicia.morales@ventura.org

Mr. Andrew Evans
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